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*Attorneys for Defendant
Harris & Harris, LTD.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BONNIE TOTH,
Plaintiff,

v.

HARRIS & HARRIS LTD,
Defendant.

Case No.: 2:22-cv-01756-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

[FOURTH REQUEST]

COMES NOW, Defendant Harris & Harris, Ltd. ("H&H"), by and through its undersigned counsel, GINA M. MUSHMECHE, ESQ. of KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD., and Plaintiff Bonnie Toth, by and through her undersigned counsel, GEORGE HAINES, ESQ. and GERARDO AVALOS, ESQ. of FREEDOM LAW FIRM, LLC, and hereby stipulate and agree to extend the deadline to **February 3, 2023** for Defendant to answer or otherwise plead in response to Plaintiff's Complaint.

This is the parties' fourth request for an extension because the parties are continuing to negotiate towards a settlement and resolution. An additional two weeks will allow for the parties to work toward amicably resolving this matter. The parties do not contemplate another request accordingly.

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This request is made in good faith and not for delay.

IT IS SO STIPULATED.

DATED this 20th day of January, 2023.

FREEDOM LAW FIRM, LLC

/s/ Gerardo Avalos, Esq.

George Haines, Esq.

Gerardo Avalos, Esq.

8985 S. Eastern Ave., Ste. 350

Las Vegas, NV 89123

Attorneys for Plaintiff

DATED this 20th day of January, 2023.

KRAVITZ SCHNITZER JOHNSON
& WATSON, CHTD.

/s/ Gina M. Mushmeche, Esq.

Gina M. Mushmeche, Esq.

8985 S. Eastern Ave., Ste. 200

Las Vegas, NV 89123

Attorneys for Defendant

ORDER

BASED UPON THE STIPULATION OF THE PARTIES, and good cause appearing
therefore,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that Defendant shall have
until **February 3, 2023** in which to respond to Plaintiff's Complaint in the action entitled *Bonnie*
Toth v. Harris & Harris, Ltd., United States District Court, District of Nevada, Court Case No.
2:22-cv-01756.

IT IS SO ORDERED.

Respectfully submitted by:

KRAVITZ SCHNITZER JOHNSON
& WATSON, CHTD.

/s/ Gina M. Mushmeche, Esq.

Gina M. Mushmeche, Esq.

8985 S. Eastern Ave., Ste. 200

Las Vegas, NV 89123

Attorneys for Defendant


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: 1/23/2023